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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

12 BOARD OF TRUSTEES OF THE
13 TEAMSTERS LOCAL 631 SECURITY
14 FUND FOR SOUTHERN NEVADA;
15 BOARD OF TRUSTEES OF THE
16 TEAMSTERS CONVENTION INDUSTRY
TRAINING FUND; BOARD OF TRUSTEES
OF THE TEAMSTERS LOCAL 631
CONVENTION VACATION SAVINGS
PLAN

17 Plaintiffs,

18

19 HOUSE OF SIGNS LLC,
20 a Nevada limited liability company;
21 RED ROCK EXHIBITS LLC,
a Nevada limited liability company

22 Defendants.

CASE NO.: 2:24-cv-02211-JCM-NJK

**STIPULATION TO EXTEND
DISCOVERY DEADLINES**

(FIRST REQUEST)

23 Plaintiffs, the Board of Trustees of the Teamsters Local 631 Security Fund For Southern
24 Nevada, the Board of Trustees of the Teamsters Convention Industry Training Fund, and the
25 Board of Trustees Teamsters Local 631 Convention Vacation Savings Plan (collectively the
26 “Trust Funds”), and Defendants, House of Signs, LLC and Red Rock Exhibits LLC (collectively
27 “Defendants”), by and through their respective counsels of record, hereby stipulate and agree to

1 extend the remaining discovery deadlines for sixty (60) days. This is the parties' first request for
2 an extension.

3 **A. Discovery completed to date.**

4 1. On February 18, 2025, the Trust Funds and Defendants served initial disclosures
5 on the other parties.

6 2. On March 28, 2025, the Trust Funds served requests for production and
7 interrogatories on both individual Defendants.

8 3. On May 5, 2025, the Defendants individually served responses to the Trust Funds'
9 requests for production and interrogatories. Defendants also provided a first supplemental
10 disclosure of documents.

11 4. On May 9, 2025, the Trust Funds provided a first supplemental disclosure of
12 documents.

13 5. On May 30, 2025, the Trust Funds served correspondence on counsel for
14 Defendants outlining the Trust Funds' claims that the recent discovery responses were not
15 sufficient.

16 6. On June 6, 2025, the Defendants served correspondence on Trust Funds
17 responding to the Trust Funds' claims and establishing that a meet and confer would occur.

18 7. On June 10, 2025, the parties held a meet and confer and resolved the disputes
19 regarding Defendants' discovery responses.

20 8. On June 20, 2025, Defendants provided supplemental responses to the Trust
21 Funds' interrogatories and requests for production.

22 **B. Discovery which still needs to occur.**

23 With the pending discovery dispute resolved, the Trust Funds intend to depose
24 Defendants' Federal Rule of Civil Procedure 30(b)(6) witnesses and may also need to exchange
25 additional discovery requests and serve subpoenas for documents as discovery progresses.
26 Defendants intend to depose the Trust Funds' Federal Rule of Civil Procedure 30(b)(6) witnesses
27 and may need to propound written discovery based on the results of the Trust Funds' pending
28 audit.

1 **C. Good cause supports this request for additional time.**

2 Here, good cause supports the parties' request to extend discovery deadlines. The Trust
 3 Funds have diligently engaged in discovery by serving initial disclosures, supplemental
 4 disclosures and requests for written discovery from Defendants. Moreover, the parties addressed
 5 discovery disputes that have arose in an attentive matter by first engaging in written
 6 correspondence and then a meet and confer. Through this process, the parties were able to resolve
 7 this potential dispute without Court intervention. In short, the parties have progressed in litigation
 8 in a responsible and professional manner.

9 Additionally, the parties have been discussing forms of potential resolution for one or both
 10 of the Defendants in this matter. While these talks are still in their infancy, the parties are seeking
 11 additional time to also permit these discussions to continue, which may remove the need to
 12 further involve this Court.

13 This request is not sought for the purposes of delay, but to allow the parties time to
 14 conduct the small remaining list of items needed for discovery and to explore potential resolution
 15 of this dispute.

16 **D. Proposed schedule for completing remaining discovery.**

17 **Current Discovery Deadlines:**

18 Discovery Cut-Off Date: July 14, 2025

19 Dispositive Motion Deadline: August 13, 2025

20 Pretrial Order: September 12, 2025

21 **Proposed New Discovery Deadlines:**

22 Discovery Cut-Off Date: September 12, 2025

23 Dispositive Motion Deadline: October 13, 2025

24 Pretrial Order: November 11, 2025

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1 In the event dispositive motions are filed, the date for filing the Joint Pretrial Order shall
 2 be suspended until thirty (30) days after the decision on the dispositive motions or by further order
 3 of the Court.

4 The parties must diligently conduct discovery.

5 BROWNSTEIN HYATT FARBER
 6 SCHRECK, LLP

7 /s/ Christopher M. Humes

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21 Attorneys for Plaintiffs

22 Dated: June 23, 2025

23 KING SCOW KOCH DURHAM LLC

24 /s/ Matthew L. Durham

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38 Attorneys for Defendants

39 Dated: June 23, 2025

40 **O R D E R**

41 **IT IS SO ORDERED.**

42 
 43 Nancy J. Koppe
 44 United States Magistrate Judge

45 **DATED:** June 24, 2025

46 **Case No. 2:24-cv-02211-JCM-NJK**